



THE CITY OF NEW YORK
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June 10, 2022

BY ECF

Honorable Nina Gershon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Rodriguez v. City of New York, et al., 16 CV 5861 (NG) (RER)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and one of the attorneys representing the defendants in the above-captioned case. Defendants respectfully request an extension of thirty (30) days from June 13, 2022, to July 13, 2022 to file the revised joint pre-trial order and briefing schedule for motions *in limine* as indicated in the Court's Minute Entry dated April 13, 2022. Defendants respectfully make this request because the undersigned is leaving the Law Department at the end of the week of June 13, 2022 and the case is in the process of being reassigned to a new attorney. Defendants respectfully make this request to give the newly assigned attorney ample time to familiarize themselves with this case. Plaintiff objects to this request. Accordingly, defendants respectfully request a thirty (30) day extension from June 13, 2022 to July 13, 2022 to file the revised joint pre-trial order and briefing schedule for motions *in limine*.

Thank you for your consideration of this request.

Respectfully submitted,
Joshua Kaufman /s/
Joshua Kaufman
Assistant Corporation Counsel
Special Federal Litigation Division

VIA ECF

To: All Counsels of Record